



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE

CALIFORNIA

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Order Instituting Rulemaking to Consider Adoption of
a General Order and Procedures to Implement the
Digital Infrastructure and Video Competition Act of
2006

R.06-10-005

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON PROPOSED DECISION**

February 13, 2007

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Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure The Utility Reform Network (“TURN”) submits these Reply Comments on the Proposed Decision (“PD”) of Commissioner Chong in the above-captioned proceeding.

Much of the effort that has occurred in this proceeding has focused on interpreting the language of Digital Infrastructure and Video Competition Act of 2006 (“DIVCA”). As the Commission and the parties have wrestled with attempting to interpret what the Legislature intended by the various sections and subsections of DIVCA, a few things are absolutely clear. The Commission, as the expert agency in, among other things, telecommunications, has been granted the power to issue statewide video franchises in California in an effort by the Legislature to have the states’ telephone companies offer video services in competition with the incumbent cable companies and satellite companies. It is also apparent that while DIVCA places some obvious constraints on the Commission’s authority, the Legislature nowhere stated that the role of the Commission was purely “ministerial.”¹ What is also evident is that the Legislature had clear concerns

¹ TURN refers the Commission to the Comments of The Consumer Federation of California on the Proposed Decision, pp. 1-10 (“CFC Comments”) for the arguments detailing why franchising is not a ministerial act. See also, Opening Comments of the California Community Technology Policy Group and Latino Issues Forum on the Proposed Decision of Commissioner Chong, pp. 2-3 (“CCTPG/LIF Comments”).

about ensuring that all Californian's get access to new video services, not just the wealthy, and that the telephone carriers' massive investments in video are not built on the backs of residential basic telephone service ratepayers. Thus, amidst the parsing of "shall" and "may" and "section" and "division" gets lost the fact that the Commission has and continues to have under DIVCA the requisite authority to enforce the prohibitions the Legislature was concerned with as well as the authority to meet the various goals outlined both in DIVCA and the Public Utilities Code.

The question of the scope of the Commission's authority under DIVCA is critical. While the PD goes to great pains to search DIVCA for limits on the Commission's authority, the fact is, as several parties have pointed out, the Legislature did not draw as tight a noose around the Commission as the PD and potential franchisees argue.² For example, the Division of Ratepayer Advocates ("DRA") and the California Community Technology Policy Group/Latino Issues Forum ("CCTPG/LIF") convincingly argue that the PD's limits on the ability of DRA to file complaint actions are inconsistent with DIVCA.³ DRA has appropriately argued that DIVCA does not preclude DRA's access to information as provided in the PD.⁴ The Consumer Federation of California ("CFC"), CCTPG/LIF and the Greenlining Institute ("Greenlining") demonstrate why protests of franchise applications are necessary and not precluded by DIVCA.⁵ Further, CFC, CCTPG/LIF and Greenlining argue why the PD's disallowance of intervenor compensation is not supported by DIVCA.⁶

Nowhere in DIVCA did the Legislature prohibit protests of franchise applications; nowhere did the Legislature say the franchise application process should be a rubber stamp; nowhere in DIVCA did the Legislature limit DRA's access to information or limit complaints; nowhere in DIVCA did the Legislature say intervenor compensation should not be permitted; and finally nowhere in DIVCA did the Legislature tell the Commission

² Ironically, in those areas where DIVCA clearly orders the Commission to act, for example mandating the prohibition of cross-subsidization, the PD provides little or no enforcement mechanisms.

³ Opening Comments of the Division of Ratepayer Advocates, pp. 5-8 ("DRA Comments"); CCTPG/LIF Comments, pp. 9-11.

⁴ DRA Comments, pp. 2-5. See also CCTPG/LIF Comments, p. 9.

⁵ CFC Comments, pp. 10-12; CCTPG/LIF Comments, p. 3; and Comments of the Greenlining Institute on the Proposed Draft Decision, pp. 10-11 ("Greenlining Comments").

⁶ CFC Comments, pp. 9-10; CCTPG/LIF Comments, p. 11; and Greenlining Comments, pp. 11-13.

that it should fail to meet its ongoing statutory responsibilities. In fact, DIVCA clearly provided that “all existing authority of the California Public Utilities Commission as established in state and federal statutes” should be maintained.⁷

In addition to the PD’s attempts to limit Commission authority, AT&T, one of those benefiting most directly from DIVCA and one of the parties that pushed the hardest for DIVCA’s passage, continue to resist the most basic of requirements imposed by the PD. While TURN, and other parties, have expressed concerns that the PD is far too narrow in its interpretation of DIVCA, at least the PD recognizes that reporting, collection and analysis of information is central to its role for assessing discrimination, build-out and provision of service to community centers.⁸ However, AT&T would limit much of those basic reporting requirements.⁹ Thus, for example, AT&T objects to the PD’s requirement that franchise applications include broadband, video and low-income household data.¹⁰ AT&T also objects to the PD’s requirement that providers with more than 1,000,000 telephone customers report the number of video subscribers.¹¹ Similarly, AT&T objects to the PD’s requirement seeking reporting on the extent to which broadband is provided using various technologies.¹² TURN submits that the PD provides a rationale explanation of why these reporting requirements are within the Commission’s authority and the Commission should reject AT&T’s efforts to modify those requirements.

In addition, AT&T argues that the Commission’s only source of “authority to open an investigation is limited to claims of discrimination or denial of access, as specified in section 5890.”¹³ In its Comments, DRA argues convincingly that DIVCA did

⁷ DIVCA Sec. 5810(a)(2)(G).

⁸ As TURN discussed in our Comments on the PD, the Commission should also require reporting, collection and analysis of data with respect to ensuring no cross-subsidization.

⁹ The other telephone carriers such as Verizon and SureWest are also on record in this proceeding as opposing the reporting requirements of DIVCA but have not, unlike AT&T, restated those positions in their comments on the PD.

¹⁰ Opening Comments of AT&T California on the Proposed Decision of Commissioner Chong, p. 6 (AT&T Comments).

¹¹ AT&T Comments, p. 7.

¹² AT&T, p. 8.

¹³ AT&T, p. 10.

not narrow the Commission's investigatory authority.¹⁴ And, even Verizon, not a huge supporter of expansive Commission authority under DIVCA, states that the Commission's authority extends at least to franchising, anti-discrimination, reporting, cross-subsidization, and fees.¹⁵ Further, Verizon argues that "[i]t stands to reason that the authority to regulate an area carries with it the obligation to do so in an informed manner, and therefore includes the authority to investigate with respect to the regulated area."¹⁶

Sometimes, logic and commonsense must dictate statutory interpretation. Thus, TURN submits that the PD should be modified to more clearly reflect the Commission's authority consistent with DIVCA.

February 13, 2007

Respectfully submitted,



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¹⁴ DRA Comments, pp. 11-13.

¹⁵ Opening Comments of Verizon California Inc. on the Proposed Decision of Commissioner Chong, p.16 (Verizon Comments).

¹⁶ Verizon Comments, p. 16 citing *See Dow Chemical v. United States*, 476 U.S. 227; 106 S. Ct. 1819 (1986) ("Common sense and human experience" indicate that "[r]egulatory or enforcement authority generally carries with it all the modes of inquiry and investigation traditionally employed or useful to execute the authority granted.").

CERTIFICATE OF SERVICE


I, Cory Oberdorfer, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

I served the attached:

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON PROPOSED DECISION**

by sending said document by electronic mail to each of the parties on the attached Service List **R.06-10-005**.

Executed this February 13, 2007, in San Francisco, California.

A handwritten signature in black ink, appearing to read 'Cory', with a large, sweeping flourish extending from the end of the signature.

Cory Oberdorfer
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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

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Filer: CPUC - CABLE TELEVISION

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